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8 Attorneys for Defendants/Counterclaimants/Third-  
9 Party Plaintiffs,  
10 **DARRICK ANGELONE, AONE CREATIVE, LLC**  
11 and **ON CHAIN INNOVATIONS, LLC**

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14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 HIDDEN EMPIRE HOLDINGS,  
17 LLC; a Delaware limited liability  
18 company; HYPER ENGINE, LLC; a  
19 California limited liability company;  
DEON TAYLOR, an individual,

20 Plaintiffs,  
21 v.

22 DARRICK ANGELONE, an  
23 individual; AONE CREATIVE, LLC  
24 formerly known as AONE  
25 ENTERTAINMENT LLC, a Florida  
26 limited liability company; ON  
27 CHAIN INNOVATIONS, LLC, a  
28 Florida limited liability company,

29 Defendants

30 Case No. 2:22-cv-06515-MWF-AGR

31 **JOINT STIPULATION TO**  
32 **CONTINUE TRIAL AND PRE-TRIAL**  
33 **DATES**

34 *[Filed Concurrently with [Proposed]*  
35 *Order]*

36 Complaint Filed: September 12, 2022

37 Trial Date: September 9, 2025

38 Assigned for all purposes to the  
39 Honorable Judge Michael W. Fitzgerald

1 DARRICK ANGELONE, an  
2 individual; AONE CREATIVE, LLC  
3 formerly known as AONE  
4 ENTERTAINMENT LLC, a Florida  
5 limited liability company; ON  
6 CHAIN INNOVATIONS, LLC, a  
7 Florida limited liability company,  
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9 Counterclaimants,

10 HIDDEN EMPIRE HOLDINGS, LLC; a  
11 Delaware limited liability company;  
12 HYPER ENGINE, LLC; a California  
13 limited liability company; and DEON  
14 TAYLOR, an individual,

15 Counterclaim Defendants

16 DARRICK ANGELONE, an individual;  
17 AONE CREATIVE, LLC, formerly  
18 known as AONE ENTERTAINMENT  
19 LLC, a Florida limited liability  
company; and ON CHAIN  
INNOVATIONS, LLC,  
a Florida limited liability company,

20 Third-Party Plaintiffs,

21 v.

22 ROXANNE TAYLOR, an individual,

23 Third-Party Defendant

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1 **TO THE HONORABLE COURT:**

2 Plaintiffs/Counterclaim Defendants HIDDEN EMPIRE HOLDINGS, LLC;  
3 HYPER ENGINE, LLC; and DEON TAYLOR (“Plaintiffs/Counterclaim  
4 Defendants”) and Third-Party Defendant ROXANNE TAYLOR (“Third-Party  
5 Defendant”) and Defendants DARRICK ANGELONE; AONE CREATIVE, LLC;  
6 AONE ENTERTAINMENT LLC and ON CHAIN INNOVATIONS, LLC  
7 (“Defendants/Counterclaimants/Third-Party Plaintiffs”) (collectively the “Parties”),  
8 by and through their counsel of record, jointly stipulate as follows:

9 **WHEREAS**, on September 12, 2022, Plaintiffs/Counter-Defendants filed  
10 their Complaint in the United States District Court for the Central District of  
11 California;

12 **WHEREAS**, on November 7, 2022, Defendants/Counterclaimants filed their  
13 Answer and Counterclaims;

14 **WHEREAS**, the Court has set the current trial date for September 9, 2025,  
15 with the Final Pretrial Conference scheduled for August 25, 2025;

16 **WHEREAS**, pursuant to the Court’s May 6, 2025 Order, the following  
17 deadlines are currently in effect:

- 18 1. August 7, 2025: File Memorandum of Contentions of Fact and Law,  
19 Exhibit and Witness Lists, Status Report regarding settlement, and all  
20 Motions in Limine;
- 21 2. August 14, 2024: Lodge Pretrial Conference Order, file agreed set of  
22 Jury Instructions and Verdict Forms, file statement regarding Disputed  
23 Instructions and Verdict Forms, and file Oppositions to Motions in Limine;
- 24 3. August 25, 2025: Final Pretrial Conference and Hearing on Motions in  
25 Limine;
- 26 4. September 9, 2025: Trial;

1       **WHEREAS**, Defendants' lead trial counsel JT Fox, Esq. has recently  
2 suffered a recurrence of a serious hearing loss condition that renders him  
3 temporarily unable to engage in litigation activity, but is expected to recover within  
4 approximately 8 to 12 weeks and intends to proceed as trial counsel thereafter;

5       **WHEREAS**, Mr. Fox's general physician, Dr. Thom Lobe, who has been his  
6 primary doctor for years and is very familiar with his health, prefers that at this time  
7 Mr. Fox withdraw from the rigors of litigation work and start getting rest for  
8 approximately 8 to 12 weeks;

9       **WHEREAS**, A letter from Dr. Thom Lobe regarding Mr. Fox's health  
10 condition is attached hereto as **Exhibit "A"**.

11       **WHEREAS**, the Parties have met and conferred and agreed that good cause  
12 exists to continue the above trial date and pre-trial deadlines by approximately  
13 ninety (90) days;

14       **WHEREAS**, the Parties do not seek to extend the Last Day to Hear Motions  
15 date;

16       **WHEREAS**, the Parties do not seek to extend the Non-Expert Discovery  
17 Cut-off date;

18       **NOW THEREFORE**, the Parties jointly stipulate and respectfully request  
19 that the Court enter an Order continuing the following deadlines:

	<b>Old Deadline</b>	<b>New Deadline</b>	
21 22 23 24 25 26 27	File Memorandum of Contentions of Fact and Law, Exhibit and Witness Lists, Status Report regarding settlement, and all Motions in Limine	August 7, 2025	November 5, 2025

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1 2 3 4 5 6 7 8 9 10 11	Lodge Pretrial Conference Order; file agreed set of Jury Instructions and Verdict forms, file statement regarding Disputed Instructions and Verdict Forms, and file oppositions	August 14, 2025	November 12, 2025
12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Final Pretrial Conference and Hearing on Motions in Limine	August 25, 2025 at 11:00 a.m.	November 21, 2025 at 11:00 a.m.
	Jury Trial (Est. 10 days)	September 9, 2025 at 8:30 a.m.	December 8, 2025 at 8:30 a.m.

**IT IS SO STIPULATED.**

Dated: August 1, 2025

**LAW OFFICES OF JT FOX &  
ASSOCIATES, APC**By: /s/ JT Fox  
J.T. Fox, Esq.  
Attorneys for Defendants,  
*Derrick Angelone, AONE  
Creative, LLC, and On Chain  
Innovations, LLC*

Dated: August 1, 2025

**KRAMER, DEBOER & KEANE**By: /s/ Sandra Calin  
Sandra Calin, Esq  
Attorneys for Defendants  
*Derrick Angelone, AONE  
Creative, LLC, and On Chain  
Innovations, LLC*

1 Dated: August 1, 2025

**NEWELL LAW GROUP PC**

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By: /s/ Felton T. Newell

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Felton T. Newell, Esq

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Attorneys for *Hidden Empire Holdings,  
LLC, Hyper Engine, LLC, Deon  
Taylor, And Roxanne Taylor*

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# **Exhibit A**

**TO THE HONORABLE JUDGE OF THE CENTRAL DISTRICT OF CALIFORNIA**

Letter Dictated and Digitally Signed In Transit

**July 29, 2025**

I am a licensed medical physician and am Mr. J.T. Fox's personal doctor and have been for the last 10 years.

My Fox suffers from a very serious medical disease known as Sudden Hearing Loss Syndrome. He was first diagnosed with this medical disease approximately five years ago. I treat Mr. Fox for this medical condition as well as the House Ear Institute in Los Angeles, California. Mr. Fox initially suffered full hearing loss in his right ear and loss of equilibrium once he was first diagnosed with this disease. Mr. Fox began to show some improvement over time with his hearing and balance, but has set backs (i.e., flare-ups) from time to time. Mr. Fox regretfully has periods where his condition will worsen significantly.

When Mr. Fox suffers a worsening of the medical condition, he will suffer full or near full hearing loss in his right ear and suffer equilibrium issues (i.e., balancing issues). He will also lose significant periods of sleep due to the medical condition. He also cannot stand on his feet for long periods of time and will suffer dizziness spells, (i.e. lightheadedness, unsteadiness and vertigo).

Mr. Fox has just experienced a worsening of his medical condition just this last month and has lost the hearing in his right ear as well as equilibrium loss. He visited the House Institute several weeks ago, who diagnosed him with new medical conditions: Menière's Disease and Auditory Hallucination. He has begun certain medical treatment over the next eight to twelve weeks.

The loss of Mr. Fox's hearing in his right ear and equilibrium makes it next to impossible for him to effectively work, especially in litigation/court matters. He also suffers from a very high static pitch that comes out of his right ear, which makes it impossible for him to hear and also makes it very difficult for him to concentrate on work matters. He is also hearing repetitive identical noises, which is affecting his cognitive abilities. These are normal effects of this medical disease.

I strongly recommend that Mr. Fox refrain from court matters at this time for all of the above reasons for a period of 12 weeks. He will need this period of time in order to get plenty of rest and to focus on his medical treatment. He absolutely, should withdraw from the rigors of litigation work for the above period until he regains his health.

I am confident that during this recoupment period he will be able to regain normal levels of hearing and less auditory disruption and be able to effectively work in his court matter.

If this Court has any questions or comments, I can be reached on my personal cell phone at (310) 993-2806.

Very best,

s/Dr. Thom E. Lobe

cc: J.T. Fox, Esq.